

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Freda L. Wolfson  
v. : Criminal No. 08-678 (FLW)  
EDWARD J. MOSBERG : ORDER

This matter having been opened to the Court on the joint application of defendant Edward J. Mosberg (Peter W. Till, Esq. and Jonathan L. Goldstein, Esq., appearing), and Christopher J. Christie, United States Attorney for the District of New Jersey (Christopher J. Gramiccioni, Assistant U.S. Attorney, appearing), for an Order declaring this matter to be a complex case pursuant to 18 U.S.C. § 3161(h)(8)(B)(ii). Having found such Order to be appropriate and good cause having been shown, the Court makes the following findings in support of entering such Order:

1. The charges in this case are the result of a lengthy investigation and involve allegations of conspiracy to commit mail fraud, alleging the use of the United States Mail to defraud the Planning Board, the Township and its citizens of its right to the honest services of the Parsippany-Troy Hills Planning Board Attorney, and mail fraud.

2. The discovery in this case is voluminous, and includes, among other items, thousands of pages of documents that were subpoenaed by the United States in the course of this investigation.

3. The defendant will require additional time to review discovery and complete his investigation of the charges.

4. The defendant will also require additional time to research and determine what pretrial motions to file, to file and respond to pretrial motions, and to prepare for pretrial hearings and for trial.

5. The defendant has consented to this continuance.

6. In light of these findings, and given the nature and complexity of the case, it is unreasonable to expect adequate preparation for motions, pretrial proceedings or the trial itself within the time limits established under the Speedy Trial Act.

7. Pursuant to Title 18, United States Code, Section 3161(h)(8)(A), the ends of justice served by granting the continuance outweigh the best interests of the public and the defendants in a speedy trial.

IT IS, therefore, on this 30<sup>th</sup> day of October, 2008,

ORDERED that:

1. This matter is hereby designated a complex case;

2. That the period of time from and including October 30, 2008, through and including March 23, 2009, shall be excluded for the purposes of computing time under the Speedy Trial Act pursuant to 18 U.S.C. §§ 3161(h)(8)(A) and 3161(h)(8)(B)(ii);

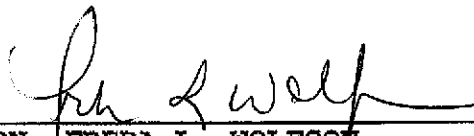
3. Defendant shall file the requested motion for a Bill of Particulars on or before October 16, 2008. The United States shall respond to this motion on or before October 31, 2008;

4. Defendant shall file all remaining motions on or before February 1, 2009;

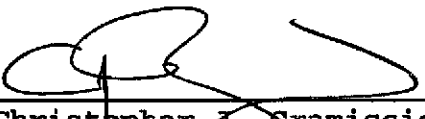
5. The United States shall respond to such motions on or before March 2, 2009;

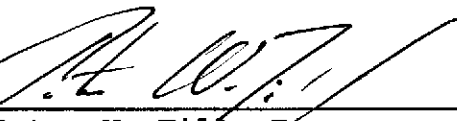
6. The return date for pretrial motions shall be March 13, 2009, <sup>@ 10:00</sup> and


7. Trial shall commence on March 23, 2009.

  
HON. FRED A. L. WOLFSON  
United States District Judge

On Consent of the Parties:

  
Christopher J. Gramiccioni  
Assistant U.S. Attorney

  
Peter W. Till, Esq.  
Counsel for defendant Mosberg

  
Jonathan L. Goldstein, Esq.  
Counsel for defendant Mosberg